

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

ANDREW CORZO, SIA HENRY, ALEXANDER  
LEGUERRA, MICHAEL MAERLENDER, BRANDON  
PIYEVSKY, BENJAMIN SHUMATE, BRITTANY  
TATIANA WEAVER, and CAMERON WILLIAMS,  
individually and on behalf of all others similarly situated,

*Plaintiffs,*

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF  
TECHNOLOGY, UNIVERSITY OF CHICAGO, THE  
TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY  
OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF  
DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY  
UNIVERSITY, GEORGETOWN UNIVERSITY, THE  
JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS  
INSTITUTE OF TECHNOLOGY, NORTHWESTERN  
UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC,  
THE TRUSTEES OF THE UNIVERSITY OF  
PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY,  
VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

*Defendants.*

Case No. 1:22-cv-00125-MFK

Judge Matthew F. Kennelly

**DECLARATION OF STEVEN WEISBROT, ESQ. OF ANGEION GROUP LLC  
RE: IMPLEMENTATION OF THE FOURTH TRANCHE NOTICE PLAN**

I, Steven Weisbrot, Esq., declare under penalty of perjury as follows:

1. I am the President and Chief Executive Officer at the class action notice and claims administration firm Angeion Group, LLC (“Angeion”). Angeion specializes in designing, developing, analyzing, and implementing large-scale legal notification plans.
2. I have personal knowledge of the matters stated herein. In forming my conclusions regarding notice in this action, I have communicated with class counsel and reviewed relevant pleadings and other documents relating to the case, in addition to drawing from my extensive class action notice experience.

3. Background information on my professional experience and Angeion’s expertise with the design and implementation of hundreds of court-approved notice and administration programs, including some of the largest and most complex notice plans in recent history, is set forth in my prior declaration submitted with the preliminary approval motion of the University of Chicago Settlement. *See* Aug. 11, 2023 Decl. of Steven Weisbrot, Esq. of Angeion Group LLC re the Proposed Notice Plan, ¶¶ 3-10 & Exhibit A, ECF No. 428-7.

#### **PRIOR DECLARATIONS & COURT ORDERS**

4. On July 20, 2024, the Court granted final judgement and order of dismissal, approving settlements with defendants Brown University, University of Chicago, the Trustees Columbia University in the City of New York, Trustees of Dartmouth College, Duke University, Emory University, Northwestern University, William Marsh Rice University, Vanderbilt University, and Yale University.

5. On January 24, 2025, the Court preliminarily approved the Plaintiffs’ proposed class settlements with the California Institute of Technology (“Caltech”) and the Johns Hopkins University (“Johns Hopkins”) (these settling defendants collectively, the “Fourth Tranche Settling Universities” or “Fourth Tranche Settling Defendants,” and these settlements, the “Fourth Tranche Settlements” or the “Settlements”). In the accompanying declaration submitted with that motion, I described the Fourth Tranche Notice Plan. *See* Jan. 17, 2025 Weisbrot Decl., ECF No. 776-7.

6. Pursuant to the Order Approving the Fourth Tranche Settlements, Angeion was appointed to serve as the Settlement Claims Administrator. *See id.* ¶ 9.

7. The purpose of this declaration is to provide the Court with details regarding the implementation of the Notice Plan, the online registrations requesting updates, requests for exclusion from the Settlements, and objections to the Settlements.

#### **SUMMARY OF THE NOTICE PLAN**

8. The Notice Plan included direct notice coupled with a robust multi-tiered media campaign designed to provide notice to Settlement Class Members via a variety of additional methods, including state-of-the-art targeted internet notice, social media notice, a paid search campaign, and two press releases.

9. The Notice Plan also provided for the implementation of a dedicated Settlement Website ([www.FinancialAidAntitrustSettlement.com](http://www.FinancialAidAntitrustSettlement.com)) and a toll-free telephone line where Settlement Class Members can learn more about their rights and options pursuant to the terms of the Settlements.

#### **SETTLEMENT CLASS MEMBER DATA**

##### **Class Data**

10. Between October 16, 2023 and March 8, 2024, Angeion received 27 electronic files from Brown University, California Institute of Technology, the University of Chicago, the Trustees of Columbia University in the City of New York, Cornell University, Trustees of Dartmouth College, Duke University, Emory University, Georgetown University, The Johns Hopkins University, Massachusetts Institute of Technology, Northwestern University, University of Notre Dame Du Lac, The Trustees of the University of Pennsylvania, William Marsh Rice University, Vanderbilt University, and Yale University containing the names, mailing addresses, and email addresses, where available, for individuals likely to be Settlement Class Members.

11. On March 27, 2024, the list of potential Settlement Class Members was supplemented with the 1,424 potential Settlement Class Members who registered online via the Settlement Website.

12. On April 1, 2024, Angeion received two supplemental electronic files from Emory containing the names, mailing addresses, and email addresses, where available, for potential Settlement Class Members.

13. In February 2025, the list of potential Settlement Class Members was supplemented with an additional 219,131 potential Settlement Class Members who registered online via the Settlement Website. Of these, 176,290 records were subsequently determined to be fraudulent and were therefore excluded from the notice lists. As a result, the notice was not sent to those 176,290 individuals.

14. After analyzing all class data, Angeion identified a total of 467,968 unique potential Settlement Class Member records (the “Class List”). Angeion identified a total of 416,930 valid email addresses on the Class List.<sup>1</sup> Angeion also identified 51,038 Class List records that did not have a valid email address

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<sup>1</sup> Some records had multiple email addresses associated with them.

(or any email address), or for which prior email notices sent during the first three tranches were unsuccessful; however, these records included sufficient mailing address information.<sup>2</sup>

15. The direct notice campaign was structured as follows: (1) Angeion emailed the Court-approved summary notice to all valid email addresses on the Class List; (2) Angeion mailed the Court-approved long-form notice via first class mail to all potential Settlement Class Members on the Class List who could not be sent notice via email<sup>3</sup>; (3) Angeion also mailed via first class mail the Court-approved long-form notice to potential Settlement Class Members whose summary notice could not be delivered via email and for whom sufficient mailing address information was on the Class List.

### **DIRECT NOTICE**

#### **Email Notice**

16. On February 21, 2025, Angeion began sending the Court-approved summary notice to the 416,930 valid email addresses identified on the Class List. Of the 416,930 summary notices sent, 401,096 were delivered and 15,834 bounced-back and could not be delivered, representing an excellent deliverability rate of approximately 96.2%. A true and correct copy of the Court-approved summary notice that Angeion caused to be emailed is attached hereto as **Exhibit A**.

#### **Mailed Notice**

17. On February 21, 2025, Angeion caused the Court-approved long-form notice to be mailed via the United States Postal Service (“USPS”) first-class mail, postage prepaid, to 51,038 potential Settlement Class Members. A true and correct copy of the Court-approved long-form notice that Angeion caused to be mailed is attached hereto as **Exhibit B**.

18. On March 19, 2025, Angeion caused the Court-approved long-form notice to be mailed via the USPS first-class mail, postage prepaid, to 13,669 potential Settlement Class Members whose initial email notices were undeliverable and for whom a sufficient mailing address was available.

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<sup>2</sup> Angeion also identified 7,783 records that could not be sent notice (*i.e.*, these records did not have a valid email address and did not have sufficient mailing address information).

<sup>3</sup> This includes potential Settlement Class Members who did not have a corresponding email address, those that had an email address that was not valid, and those whose prior email notices could not be delivered in the previous tranches.

19. Prior to mailing, Angeion caused the mailing addresses to be processed through the USPS National Change of Address database, which provides updated address information for individuals or entities that have moved during the previous four (4) years and filed a change of address with the USPS.

20. Long-form notices returned to Angeion by the USPS with a forwarding address were re-mailed to the new address provided by the USPS. Long-form notices returned to Angeion by the USPS without a forwarding address were subjected to address verification searches (“skip traces”), and long-form notices were re-mailed to any updated addresses identified through the skip trace process.

21. Through April 14, 2025, Angeion has received approximately 3,544 long-form notices returned by the USPS as undeliverable. As a result of the above-described efforts, a total of 1,918 long-form notices were re-mailed to updated addresses.

#### **PRESS RELEASE**

22. On February 21, 2025, Angeion caused the first press release to be issued via PR Newswire. The press release was picked up by a total of 627 media outlets, which have a combined potential audience size of approximately 167.4 million. A true and accurate copy of the Court-approved press release is attached hereto as **Exhibit C**. The second press release will be issued via PR Newswire if the Court grants final approval and claim filing begins.

#### **MEDIA CAMPAIGN**

23. The state-of-the-art comprehensive media campaign consisting of social media advertising via Facebook and Instagram, programmatic display advertising (“internet banner ads”), and a paid search campaign via Google was designed to deliver an approximate 75.31% reach with an average frequency of 3.22 times each.

24. What this means in practice is that the media campaign was designed so 75.31% of the Target Audience<sup>4</sup> (potential Settlement Class Members) would have a digital advertisement concerning the

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<sup>4</sup> To develop the media notice campaign and to verify its effectiveness, our media team analyzed data from 2022 comScore Multi-Platform/MRI Simmons USA Fusion to profile the Settlement Class and arrive at an appropriate target group (“Target Audience”) based on criteria pertinent to this Settlements. Specifically, the following syndicated research definition was used to profile potential Settlement Class Members: Respondent: Attended College: Yes **and** Loans and Mortgages: Personal Loan for Education (Student Loan) Have Personally or Jointly Utilized **and** Ages 18-44. See Jan. 22, 2024 Weisbrot Decl. ¶ 18, ECF No. 603-10.

Settlements displayed to them an average of 3.22 times each. This is separate and apart from the direct email and mail notice efforts, press release, Settlement Website, and toll-free hotline.

### **Social Media Advertising**

25. On February 21, 2025, Angeion commenced the social media campaign utilizing the social media platforms Facebook and Instagram to notify and drive potential Settlement Class Members to the dedicated Settlement Website where they could find more information about the Settlements and submit a request to stay updated on when Claim Forms are made available.

26. The social media campaign engaged with the Target Audience via Facebook and Instagram's desktop sites, mobile sites, and mobile apps.

27. As of March 22, 2025, the social media campaign concluded, serving approximately 17,443,654 impressions. True and correct copies of the social media notices that Angeion used as part of this Notice campaign are attached hereto as **Exhibit D**.

### **Programmatic Display Advertising**

28. On February 21, 2025, Angeion commenced the programmatic display advertising (internet banner notice) campaign to target and deliver advertisements concerning the Settlements to the Target Audience via websites potential Settlement Class Members are most likely to visit based on objective syndicated data.

29. The campaign was designed to notify and drive potential Settlement Class Members to the Settlement Website where they could find more information about the Settlements and submit a request to stay updated on when Claim Forms are made available.

30. As of March 22, 2025, the internet banner notice campaign concluded, serving approximately 19,513,890 impressions. True and correct copies of the internet banner notices that Angeion used as part of the Court-approved Notice campaign are attached hereto as **Exhibit E**.

### **Paid Search Campaign**

31. On February 21, 2025, Angeion commenced the paid search campaign via Google to help drive potential Settlement Class Members who are actively searching for information about the Settlements to

the dedicated Settlement Website. As of March 22, 2025, the paid search campaign concluded, serving approximately 27,838 impressions.

### **REACH & FREQUENCY**

32. The state-of-the-art media campaign, as noted, was designed to deliver an approximate 75.31% reach with an average frequency of 3.22 times each and serving approximately 29 million impressions. The media campaign *exceeded expectations* by serving over 35 million impressions, resulting in approximate **86.61%** reach with an average frequency of 4.17 times each.

33. The Federal Judicial Center states that a publication notice plan that reaches 70% of class members is one that reaches a “high percentage” and is within the “norm.” Barbara J. Rothstein & Thomas E. Willging, Federal Judicial Center, “Managing Class Action Litigation: A Pocket Guide for Judges,” at 27 (3d Ed. 2010).

### **SETTLEMENT WEBSITE & TOLL-FREE TELEPHONE SUPPORT**

#### **Settlement Website**

34. On January 23, 2024, Angeion established the following website devoted to these Settlements [www.FinancialAidAntitrustSettlement.com](http://www.FinancialAidAntitrustSettlement.com).

35. Subsequently, on February 21, 2025, Angeion created a dedicated subpage for the Caltech and Johns Hopkins Settlements, accessible at [www.FinancialAidAntitrustSettlement.com/caltech-johns-hopkins-settlement](http://www.FinancialAidAntitrustSettlement.com/caltech-johns-hopkins-settlement) (“Caltech and Johns Hopkins Subpage”). The Caltech and Johns Hopkins Subpage contains general information about the Settlements, including answers to frequently asked questions, important dates and deadlines pertinent to this matter, and copies of important documents.

36. Visitors to the Caltech and Johns Hopkins Subpage can view or download the following important documents: (1) Motion and Memorandum of Law in Support of Settlement Class Counsel’s Motion for Service Awards for Class Representatives, Reimbursement of Expenses, and Attorneys’ Fees; (2) the Notice of Class Action Settlements; (3) the Order Preliminarily Approving Caltech and Johns Hopkins Settlements; (4) the Caltech Settlement Agreement; (4) the Johns Hopkins Settlement Agreement; (5) Plaintiffs’ Proposed Fourth Tranche Allocation Plan; and (6) the Second Amended and Supplemental Class

Action Complaint. If approved by the Court, the Claim Form will be incorporated onto the Settlement Website. The proposed Claim Form is attached hereto as **Exhibit F**.

37. The Caltech and Johns Hopkins Subpage also has a “Contact Us” page whereby Settlement Class Members can submit questions regarding the Settlements to a dedicated email address: [Info@FinancialAidAntitrustSettlement.com](mailto:Info@FinancialAidAntitrustSettlement.com). The address for the Settlement Website was set forth in the Long Form Notice and Email Notice.

38. As of April 21, 2025, the Settlement Website has had 249,273 page views and 85,003 sessions by 53,541 unique users.

#### **Requests for Updates and Additional Information**

39. On February 21, 2025, Angeion established an online register for updates portal whereby potential Settlement Class Members can complete and submit a request to receive updates about the Caltech and Johns Hopkins Settlements and be notified when claim forms are made available.

40. As of April 21, 2025, Angeion has received a total of 2,882 online registrations for updates.

#### **Toll-Free Telephone Support**

41. On January 23, 2024, Angeion established the following toll-free line dedicated to these Settlements: 1-833-585-3338. The toll-free line utilizes an interactive voice response (“IVR”) system to provide Settlement Class Members with responses to frequently asked questions, the ability to request the long-form notice, and information about filing a claim and important dates and deadlines. The toll-free line is accessible 24 hours a day, 7 days a week.

42. On February 21, 2025, Angeion updated the IVR system to include a dedicated menu option specifically addressing information related to the Caltech and Johns Hopkins Settlements, allowing callers to easily access the information related to the most recent Settlements.

43. As of April 21, 2025, the toll-free number has received approximately 1,330 calls, totaling 4,176 minutes, and 147 voicemails. Angeion returned any voicemail that required a call-back, where applicable.

#### **OPT-OUTS AND OBJECTIONS**

44. The deadline for Settlement Class Members to request exclusion from the Settlements was April 9, 2025. As of April 24, 2025, Angeion has received six (6) requests for exclusion. Of these, five (5)



requests were timely and one (1) was postmarked late. Attached hereto as **Exhibit G** is a list of the names of the six (6) individuals who have requested to be excluded from these Settlements.

45. The deadline for Settlement Class Members to object to the Settlements was April 9, 2025. As of April 21, 2025, Angeion has not received any objections to the Settlements.

#### **NOTICE & ADMINISTRATION COSTS**

46. As of March 31, 2025, the approximate cost to provide notice and administration services has totaled \$324,101.99. Angeion will keep the Parties apprised of administration costs incurred as the settlement administration process proceeds.

#### **CONCLUSION**

47. The Notice Plan implemented in these Settlements included direct notice via email or mail, complemented by a robust, state-of-the-art media campaign that independently delivered an approximate 86.61% reach, the issuance of a press release, and the creation of the dedicated Settlement Website and toll-free telephone support.

48. The Notice Plan resulted in over 480,000 notices disseminated via email or mail, over 36 million digital impressions served, and a press release with a potential audience size of approximately 167.4 million. The response to the Notice Plan has been overwhelmingly favorable, with over 50,000 unique visitors to the Settlement Website and over 2,500 online registrations for future updates, compared to only six (6) opt-outs and zero objections to the Settlements.

49. It remains my professional opinion that the Notice Plan provided full and proper notice to Settlement Class Members before the opt-out and objection deadlines, and was the best notice practicable under the circumstances, fully compliant with due process and Fed. R. Civ. P. 23.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: April 24, 2025

  
STEVEN WEISBROT